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MENZIES AVIATION, INC., DOING BUSINESS AS MENZIES

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

RENALDO NAVARRO,

Plaintiff,

vs.

MENZIES AVIATION, INC., DOING
BUSINESS AS MENZIES; and DOES 1
through 10, inclusive,

Defendants.

Case No.: 3:19-CV-08157-VC

Honorable Vince Chhabria

**STIPULATION TO CONTINUE
PLAINTIFF'S DEADLINE TO FILE
OPPOSITION TO DEFENDANT'S
MOTION FOR SUMMARY JUDGMENT
AND [PROPOSED] ORDER**

State Court Action Filed: 10/23/19
Action Removed: 12/16/19

1 Plaintiff Renaldo Navarro and Defendant Menzies Aviation, Inc. hereby stipulate to
2 move Plaintiff's opposition filing deadline to Defendant's Motion for Summary Judgment,
3 currently scheduled for October 29, 2020, to November 2, 2020, as follows:

4 1. On July 15, 2020, during the Further Case Management Conference, this Court
5 vacated the trial date the parties had previously set during the March 11, 2020 Case Management
6 Conference in light of the continuing uncertainty related to the COVID-19 pandemic. During
7 that same Further Case Management Conference, the Court and the Parties agreed to move the
8 original last day to hear a dispositive motion from October 1, 2020 to November 5, 2020.

9 2. Based on the November 5, 2020 hearing date, pursuant to Northern District of
10 California Local Rule 7-2(a), the last day to file any dispositive motion would be October 1,
11 2020.

12 3. On October 2, 2020, and in response to Defendant's request, the parties agreed by
13 stipulation to move the dispositive motion hearing date from November 5, 2020 to November 19,
14 2020.

15 4. This Court signed the order moving the hearing date on October 9, 2020 [Docket
16 27].

17 5. On October 15, 2020, Defendant filed a Motion for Summary Judgment, or in the
18 alternative, Partial Summary Judgment. Pursuant to Northern District California Local Rule 7-
19 3(a), Plaintiff's deadline to file an opposition would be October 29, 2020.

20 6. During the week of October 19, 2020 through October 28, 2020, Plaintiff's
21 attorney had unexpected work travel to attend to an employee health matter. The emergency and
22 scheduling conflicts impacted his time and ability to prepare and file an opposition to Defendants
23 Motion for Summary Judgment.

24 7. Pursuant to Northern District of California Local Rule 6.2(a), Plaintiff requests a
25 five-day extension of time to file opposition to Defendant's Motion for Summary Judgment from
26 Thursday, October 29, 2020 to Monday, November 2, 2020.

27 8. Defendant has no objection to Plaintiff's attorney's request for more time in light
28 of his adverse personal circumstances.

[PROPOSED] ORDER

The Court has reviewed the Parties' stipulation to move Plaintiff's opposition filing deadline to Defendant's Motion for Summary Judgement from October 29, 2020 to November 2, 2020 and agrees the Parties have demonstrated good cause for such relief. Accordingly, the Court hereby orders that the last day for Plaintiff to file opposition shall be continued from October 29, 2020 to November 2, 2020. Defendant's deadline to file a reply is not impacted by this stipulation.

The Motion for Summary Judgment hearing date shall be _____.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated:

By: _____
Hon. Vince Chhabria
United States District Judge